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FILED US District Court-UT OCT 05'22 PM03:13

IN THE UNITED STATES DISTRICT COURT DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

Telephone: (801) 524-5682

VS.

NASOUH ALBASIS-ALBASIS, RICHARD DJASSERAMBAYE, and DODJIM LECLAIRE,

Defendants.

INDICTMENT

VIOLATIONS:

Count I: 18 U.S.C. § 2251(a) and (e), Production of Child Pornography and 18 U.S.C. § 2, Aiding and Abetting;

Count II: 18 U.S.C. § 2252A(a)(2)(A), (B) and (b)(1), Distribution of Child Pornography and 18 U.S.C. § 2, Aiding and Abetting.

The Grand Jury Charges:

Case: 2:22-cr-00376

Assigned To: Campbell, Tena Assign. Date: 10/5/2022

COUNT I

18 U.S.C. § 2251(a) and (e) (Production of Child Pornography)

On or about September 9, 2017, in the District of Utah,

NASOUH ALBASIS-ALBASIS, RICHARD DJASSERAMBAYE, and DODJIM LECLAIRE,

defendants herein, did employ, use, persuade, induce, entice and coerce Minor A, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be

transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and the visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and attempted to do so, and did aid and abet therein; all in violation of 18 U.S.C. § 2251(a) and (e) and 18 U.S.C. § 2.

COUNT II

18 U.S.C. § 2252A(a)(2)(A), (B) and (b)(1) (Distribution of Child Pornography)

On or about September 9, 2017, in the District of Utah and elsewhere,

NASOUH ALBASIS-ALBASIS, RICHARD DJASSERAMBAYE, and DODJIM LECLAIRE,

defendants herein, did knowingly distribute any child pornography, and material that contained child pornography, as defined in 18 U.S.C. § 2256(8), that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by

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computer, and attempted to do so, and did aid and abet therein; all in violation of 18 U.S.C. § 2252A(a)(2)(A), (B), and (b)(1) and 18 U.S.C. § 2.

A TRUE BILL:

FOREPERSON OF GRAND JURY

TRINA A. HIGGINS United States Attorney

CARŌL A. DAIÑ

Assistant United States Attorney